

EXHIBIT A

Stipulation and Order (DRAFT)

With regard to the Court's Nunc Pro Tunc Order (Doc #1540), the parties agree as follows:

- 1. Notwithstanding the provisions of the third full paragraph on page 2 of the Order, the defendants will pick the 10 plaintiffs' experts who the defendants will depose for 2 days (7 hours per day). Defendants will make that selection by 4 pm on Tuesday 4/16/19. The parties acknowledge that a few deposition dates may have to be scheduled after 4/26/19. Likewise, the plaintiffs will pick the 10 defendants' experts who defendants will depose for 2 days (7 hours per day). Plaintiffs will make that selection within 72 hours after production of the defendants' expert reports.**
- 2. Plaintiffs may supplement any expert reports and any supplementation will be reasonable and tailored and provided as soon as practicable prior to the deposition of the witness. Plaintiffs will notify defendants by 4/16/19 as to which expert reports will be supplemented.**
- 3. Both sides will use their best efforts to schedule expert witnesses who will be deposed for 2 days on two consecutive days.**
- 4. This agreement will be submitted to the Court for approval. Specifically, the parties agree that this agreement will not impact either side's decision of which expert witnesses they will call at trial and will ask the court to approve this agreement in that regard. If the court does not approve this stipulation, it will be null and void and of no effect.**

All other provisions of the Order will remain in place.

EXECUTION BY BOTH SIDES

IT IS SO ORDERED:

JUDGE DAN POLSTER